

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
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NATHAN REARDON,
Plaintiff,

2025 MAY 20 A 10:37

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v.

JEFF WALLACE, individually and in his official capacity
as Code Enforcement Officer for the City of Bangor, and
CITY OF BANGOR,
Defendants.

Civil Action No.: _____

COMPLAINT AND DEMAND FOR JURY TRIAL

PARTIES

1. Plaintiff Nathan Reardon is a natural person residing in Plymouth, Maine, with mailing address PO Box 52, Detroit, ME 04929.
2. Defendant Jeff Wallace is the Code Enforcement Officer for the City of Bangor, who at all times relevant acted under color of state law and is sued in both his individual and official capacities.
3. Defendant City of Bangor is a municipal government responsible for the actions of its employees, including Jeff Wallace.

JURISDICTION AND VENUE

4. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343 because this action arises under federal law, including 42 U.S.C. § 1983.
5. Venue is proper in this district under 28 U.S.C. § 1331 because the events giving rise to this claim occurred in Bangor, Maine.

FACTUAL ALLEGATIONS

6. Plaintiff lawfully occupied approximately 2,000 square feet of former Sears office space on the second floor at 693

7. On or around January 2022, Plaintiff discovered a severe water leak caused by a frozen sprinkler pipe. The sprinkler system covered the entire building, not just Plaintiff's space.

8. The pipe froze and broke due to a door left ajar by the sprinkler repair crew contracted by the Bangor Mall, allowing cold air to directly strike the pipe.

9. Plaintiff immediately contacted mall maintenance and reported the issue. Maintenance staff confirmed the city was called to shut off the water, and that the incident was not Plaintiff's fault.

10. Despite this, on January 18, 2022, Jeff Wallace, acting as Code Enforcement Officer, condemned the property and falsely attributed the incident to Plaintiff, as later reported in the Bangor Daily News.

11. Defendant Wallace used the incident as an opportunity to defame Plaintiff in a public news article, furthering a pattern of selective enforcement and personal animus.

12. Wallace has a history of targeting Plaintiff with excessive and unequal code enforcement actions, acting in bad faith and outside the bounds of professional conduct.

CAUSES OF ACTION

Count I – Defamation (Libel and Slander)

Count II – Intentional Infliction of Emotional Distress

Count III – Violation of Civil Rights under 42 U.S.C. § 1983 (Selective Enforcement)

DAMAGES AND RELIEF

WHEREFORE, Plaintiff requests that this Court:

- A. Award compensatory damages against all Defendants;
- B. Award punitive damages against Jeff Wallace individually;
- C. Issue injunctive relief barring future selective enforcement;
- D. Award attorney's fees under 42 U.S.C. § 1988;
- E. Grant such other and further relief as this Court deems just and proper.

Plaintiff demands judgment in the amount of \$1,500,000, including compensatory, punitive, and special damages,

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

Dated: May 14, 2025



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